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ROBERT H. SHEMVELL, CLERK
 WESTERN DISTRICT OF LOUISIANA
 SHREVEPORT

**Form to be used by a prisoner filing a civil rights complaint under
 THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983**

U.S. DISTRICT COURT
 WESTERN DISTRICT OF LOUISIANA
 FILED

OCT 03 2003

**UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF LOUISIANA**

SEC P
 ROBERT H. SHEMVELL, CLERK
 BY *mm*
 DEPT. I

RONALD LEE WASHINGTON #4858
 Full Name of Plaintiff, Prisoner Number

CV03-1845-S
 Civil Action

JUDGE WALTER

VS.
DEPARTMENT OF CORRECTIONS, SHREVEPORT, LA
SHREVEPORT PROBATION & PAROLE OFFICE
 Full Name of Defendant

Judge
MAGISTRATE JUDGE PAYNE
 Magistrate Judge

COMPLAINT

I. Previous Lawsuits

A. Have you begun any other lawsuit while incarcerated or detained in any facility?
 Yes ☒ No ☒

B. If your answer to the preceding question is yes, provide the following information.

1. State the court(s) where each lawsuit was filed (if federal, identify the District; if state court, identify the county or parish):

WESTERN DISTRICT SHREVEPORT, LA
FEDERAL COURT, CADDO PARISH

2. Name the parties to the previous lawsuit(s):

Plaintiffs: RONALD L. WASHINGTON
 Defendants: BOSSIER PARISH SHERIFF'S OFFICE

3. Docket number(s): UNKNOWN

4. Date(s) on which each lawsuit was filed: 6/26/03

5. Disposition and date thereof [For example, was the case dismissed and when? Was it appealed and by whom (plaintiff or defendant)? Is the case still pending?]:

DISMISSED, FRIVOLOUS

- C. Have you filed any lawsuit or appeal in any federal district court or appeals court which has been dismissed?

Yes _____ No ☒

If your answer to the preceding question is yes, state the court(s) which dismissed the case, the civil action number(s), and the reason for dismissal (e.g., frivolity, malice, failure to state a claim, defendants immune from relief sought, etc.).

II. A. Name of institution and address of current place of confinement:

Caddo Correctional Center

- B. Is there a prison grievance procedure in this institution?

Yes ☒ No _____

1. Did you file an administrative grievance based upon the same facts which form the basis of this lawsuit?

Yes _____ No ☒

If Yes, what is the Administrative Remedy Procedure number? _____

2. If you did not file an administrative grievance, explain why you have not done so.

BECAUSE THIS DOESN'T PERTAIN TO C.C.C.

→ D.O.C. and Shreveport District Probation & Parole

3. If you filed an administrative grievance, answer the following question.

What specific steps of the prison procedure did you take and what was the result? (For example, for state prisoners in the custody of the Department of Public Safety and Corrections: did you appeal any adverse decision through to Step 3 of the administrative grievance procedure by appealing to the Secretary of the Louisiana Department of Public Safety and Corrections? For federal prisoners: did you appeal any adverse decision from the warden to the Regional Director for the Federal Bureau of Prisons, or did you make a claim under the Federal Tort Claims Act?)

Attach a copy of each prison response and/or decision rendered in the administrative proceeding.

III. Parties to Current Lawsuit:

- A. Name of Plaintiff RONALD L. WASHINGTON
 Address C.C.C. P.O. Box # 70110 Shreveport, LA 71137-0110
- B. Defendant, Department of Corrections, is employed as
Adult Services at Baton Rouge.
 Defendant, PROBATION & PAROLE SPT, LA is employed as
ADMINISTRATOR'S at District Office.
 Defendant, CHEERLY, SHEKNAUDER, HENRY, GOINS is employed as
COMPUTER-ING-TIME SENTENCES Department of Corrections
 Additional defendants LOUIS, STACKS, FRANK, LEONARD, KERRY, PHILLIP,
CHARLES, STEPHENSON, Shreveport District Probation & Parole Office

IV. Statement of Claim

State the FACTS of your case. Specifically describe the involvement and actions of each named defendant. Include the names of all persons involved in the incident(s) or condition(s) giving rise to this lawsuit, and the dates upon which and the places where the incident(s) and/or condition(s) occurred. **YOU ARE REQUIRED TO SET FORTH ONLY FACTUAL ALLEGATIONS. YOU ARE NOT REQUIRED TO SET FORTH LEGAL THEORIES OR ARGUMENTS.**

I RECEIVE a (1) year parole, supervision sentence.
HOWEVER I'VE NOW SERVE the total length of the sentence completely. Although i've been told by probation & parole of shreveport District, that I (WASNT) finish serving the actual sentence. HOWEVER I WAS ARRESTED ON the date of (4/16/02) until being release on (1/12/03) back, Active Parole, Supervision. HOWEVER I REVOKED MY PAROLE again on 3/26/03 until 7/8/03 in which completed the whole (1) year sentence. HOWEVER I WAS VIOLATED by my parole officer ON (9/5/03) ONCE AGAIN, FOR THESE VIOLATION RULES NUMBERS (1#) & (8#), NOT REPORTING & BEING INVOLVED IN CRIMINAL ACTIVITIES OF A NEW FELONY CHARGE.

Although I shouldn't HAVE NEVER BEING held
with a hold by (probation & parole) & Department of
CORRECTIONS. THERES A big Miscalculation in my sentence
I'M NOW SERVING 2 1/2 Additional months for nothing By
V. **Relief All means NECESSARY**

State exactly what you want the court to provide to you or do for you. Make no legal arguments. Cite no cases or statutes.

That I rewarded for serving the 2 1/2
months incarcerated, in the sum's and amount
of \$400,550 dollars immediately and taken off PAR
SUPERVISION

VI. Plaintiff's Declaration

- A. I understand that if I am transferred or released, I must apprise the Court of my address, and my failure to do so may result in this complaint being dismissed.
- B. I understand that I may not proceed without prepayment of costs if I have filed three lawsuits and/or appeals that were dismissed on grounds that the action and/or appeal was frivolous or malicious, or failed to state a claim upon which relief may be granted, unless I am in imminent danger of serious physical injury.

Signed this 23 day of SEPTEMBER, 2003.

[REDACTED] # 106426
Prisoner no. (Louisiana Department of
Corrections or Federal Bureau of Prisons)

Ronald L. Washington
Signature of Plaintiff

4/03

OCT 03 2003

PARTIES) ↔

The Plaintiff RONALD L. WASHINGTON WAS INCARCERATED at (Caddo CORRECTIONAL CENTER) during the EVENTS described in this complaint. ~~5:03 PM~~

2# Defendants, Department of CORRECTIONS, SHREVEPORT, LA Probation and parole District office, ARE Probation & parole Officers ^{Administrator} LOUIS STACKS, CHARLES STEPHENSON. They ARE BEING SUED in their individual capacities, KERRY PHILLIPS, D.O.C.

3# Defendants, Department of CORRECTIONS BATON ROUGE, LA. ^(MASTER PRISON RECORDS) (adult SERVICES). Cheryl SHAKESNYDER whose ONE of the individuals who is probably in charge of adding PRISONERS RE dates and SENTENCES. They ARE BEING SUED in their individual capacities.

4# Defendants, of D.O.C. and MASTER PRISON RECORDS NAME ARE UNKNOWN PRESENTLY to plaintiff. They ARE BEING SUED in their individual capacities

5# Defendants, Louis STACKS is ONE of the administrators at the SHREVEPORT, LA Probation & parole District. He is BEING SUED in his individual capacity.

6# Defendants, CHARLES STEPHENSON is the parole officer in charge of the parole of the plaintiff.

8# ALL DEFENDANTS HAVE acted, and continue to act, under color of state law at all times relevant to this complaint.

(FACTS) \longleftrightarrow ON 4/16/02 plaintiff's REVOKED his ACTIVE (PAROLE SUPERVISION) and STARTED SERVING his ~~(2 year)~~ PAROLE SENTENCE

1# ON Cheryl ^{SHEKIN} ~~SHEKIN~~, the plaintiff was incarcerated at the Caddo Correctional Center for (violation) of his PAROLE SUPERVISION. where he was later TRANSFERRED to Natchitoches Parish Detention on 8/26/02. At the time plaintiff only had ~~(18)~~ MONTHS LEFT ON the ORIGINAL PAROLE SUPERVISION.

2# Plaintiff WAS RELEASED ON 10/12/02 FROM Natchitoches Parish Detention Center, AND TRANSFERRED TO (BOSSIER PARISH PENAL FARM) Located in Plain, Dealing, LA. where plaintiff stayed until being (RELEASED) ~~Back~~ INTO SOCIETY ON 1/12/03.

3# Plaintiff, WAS ARRESTED ON (violation) of PAROLE SUPERVISION, ON 3/26/03 and RELEASED ON the 7/8/03. Therefore plaintiff didn't have anymore SUPERVISION LEFT.

4# Plaintiff, WAS ARRESTED ON 8/12/03, and charged with (THEFT of Goods), however a parole officer

5# Plaintiff WAS PLACED UNDER A DIRECT (Hold) FROM PROBATION AND PAROLE OF SHERPORT, LA District, for BEING ARRESTED ON (Theft of Goods). This caused the plaintiff to not be able to MAKE BOND, due to the there WAS a Hold. THE RECORDS FROM PROBATION & PAROLE. WHEN THERE SHOULD NOT HAVE NEVER BEEN A HOLD EVER INDICATED BY NO MEANS NECESSARY.

(DENIAL of Due PROCESS) ↔

(1#) THE of 9/5/03 plaintiff, WAS REVOKED by my pard officer MR. CHARLES STEPHENSON, AND ORDERED TO START SERVING (3) MORE MONTHS again.

(2#) plaintiff, WASN'T NEVER ISSUED A COPIE OF THE RECORDS STATING THE DATE OF REVOKED (PAROLE, SUPERVISION) AS REQUESTED UPON THE REVOCATION HEARING PROCESS.

(3#) plaintiff, CLEARLY ADVISED HIS PAROLE OFFICER THAT HE HAD ALREADY SERVE HIS (PAROLE, SUPERVISION) PRIOR TO THEIR REVOCATION HEARING. ALTHOUGH THE P.D. INSISTED HE HADN'T FINISH THE SENTENCE BY HIS RECORDS.

(4#) plaintiff, STATES HE WROTE ONE OF ADMINISTRATIVE WHO'S IN CHARGE OF ALL...

aims of relief) ↔

(1#) The actions of defendants, STEPHENSON, PHILLIPS, DR STACKS, LEONARD, in using mental force against the plaintiff without need or provocation, or in failing to intervene to prevent the misuse of force, were done maliciously and sadistically and constituted cruel and unusual punishment in violation of the Eighth Amendment of the United States Constitution.

(2#) The actions of defendants, STEPHENSON, LEONARD, STACKS, PHILLIPS, D.O.C. in using their Authority as mental force against plaintiff without need or provocation constituted the tort of Assault and battery under Law of the United States etc.

(3#) The failure to provide adequate records, The defendants, STEPHENSON, LEONARD, STACKS, D.O.C., PHILLIPS, try to curb the known pattern of abusing their authority toward the plaintiff, constituted deliberate indifference, and contributed to and proximately caused the above described violation of Eighth Amendment rights and assault and battery mentally.

(4#) The actions of defendants, STEPHENSON, LEONARD, STACKS, PHILLIPS, D.O.C. in using their Authority as mental force against plaintiff without need or provocation constituted the tort of Assault and battery under Law of the United States etc.

Misuse of Authority ↔

(1#) Shortly after these events, defendants, STEPHENSON, STACKS, ^{FRANK} LEONARD, returned to the plaintiff housing area Caddo Correctional Center stating that plaintiff was parole was being violated by conditions (1#) & (8#).

(2#) plaintiff, was told that the parole Board down in BATON ROUGE, LA was (3) months behind. And that it was best that plaintiff go ahead and [REDACTED] sign the violation paperwork, so his time would go ahead and start immediately.

(3#) MR. LEONARD and MR. STEPHENSON at this time acted very unprofessional in their investigation of the process of trying to obtain the plaintiff records and facts.

(4#) plaintiff, states that he was cooperating with these officers, so he wouldn't have to wait (3) more additional months, to receive a revocation hearing date. Because he was advised that it would be in the best interest of the plaintiff to violate himself effective. 9/5/03

(5#) And there is

Relief, Requested) ↔

(1#) Wherefore, Plaintiff requests that the court grant the following relief:

A# Issue a declaratory Judgement stating that:

(1#) That the MENTAL abuse of Plaintiff by defendants, STEPHENSON, LEONARD, STACKS, D.O.C., phillips, violated the plaintiff's rights under the Eight Amendment to the United States constitution and constituted and (MENTAL) Assault and battery under state LAW.

(2#) Defendants, STEPHENSON, STACKS, LEONARD, phillips, D.O.C, failure to take actions in conducting to curb the (MENTAL) abuse of the prisoner violate the plaintiff's rights under the Eight Amendment to the United States constitution and constituted a MENTAL assault & battery under Law of the state.

(3#) Defendants, STACKS, phillips, D.O.C., LEONARD, STEPHENSON, failure to take actions in conducting the plaintiff's (parole, supervision) records to curb the (miscalculation) of his time served in sustaining it, violated the plaintiff rights under the due process clause of the fourteenth, Amendment.

(C#) ~~ISSUE~~ an injunction ordering defendants to:

1# Release the plaintiff from the custody of probation & parole, and place back into society, with the restoration of all rights and privileges available to him.

(D#) Award compensatory damages in the following amounts:

(1#) \$400,000 Jointly and severally against defendant STEPHENSON, D.O.C. Chery, Shernayder, Phillips, Stacks LEONARD, ~~Shreveport~~, LA Probation & Parole District Office for the physical and mental emotional injuries sustained as a result of the plaintiff's serving a new sentence he shouldn't have by no means necessary.

(2#) \$50,000 Jointly and severally against defendant STEPHENSON, Phillips, Stacks, D.O.C. Chery, Shernayder, LEONARD, Shreveport, Probation & Parole District Office, for the punishment and emotional injury resulting from their denial of due process in connection with the plaintiff's ~~mis~~ (miscalculation) records, and incarceration proceedings.

(3#) \$50,000 Jointly and severally

Case 5:03-cv-01845-DEW-RSP Document 1 Filed 10/03/03 Page 12 of 12 PageID #: 12
(E#) AWARD Punitive damages in the following Amount:

(1#) \$25,000 EACH against defendants, STEPHENSON, STACKS, LEONARD, phillips, DEPARTMENT OF CORRECTIONS ADULT SERVICE, CHERLY, SHEXNAYDER probation & parole District office of shreveport, LA.

(2#) \$20,000 EACH against defendants, DEPARTMENT OF CORRECTIONS ADULT SERVICE, SHREVEPORT District probation & parole office, STEPHENSON, phillips, STACKS, LEONARD, CHERLY S

(3#) \$25,000 EACH against defendants, CHERLY, SHEXNAYDER, LOUIS, STACKS, KERRY, phillips, FRANK, LEONARD, CHARLES STEPHENSON, (probation & parole shreveport, LA District) DEPARTMENT OF CORRECTIONS ADULT SERVICE MASTER PRISON RECORDS

(F#) DATE: 9/11/03

PLAINTIFF NAME: RONALD LEE, WASHINGTON

PLAINTIFF ADDRESS: CADDO CORRECTIONAL CENTER
P.O. BOX # 70110
SHREVEPORT, LA 71137

Respectfully submitted:
MR. Ronald L. Washington